June 22, 2009

Charles M. Forman** Michael E. Holt** Daniel M. Fliades* Stephen B. Ravin** Erin J. Kennedy*** Joseph M. Cerra** Kim R. Lynch** William L. Waldman** David S. Catuogno*** Harry M. Gutfleish** Wendy B. Green** Kristin T. Mihelic**** Kimberly J. Salomon** Robert H. Johnson*** Jonathan S. Bodner*** Dipesh Patel***

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REPLY TO PARAMUS

Honorable Morris Stern United States Bankruptcy Court PO Box 1352 Newark, New Jersey 07601-1352

RE: Bayonne Medical Center Case No. 07-15195 (MS)

Allen D. Wilen, Liquidating Trustee for Bayonne Medical Center

Liquidating Trust v. Mohammad Asif, MD

Adv. Pro. No. 09-1656

Pre-trial Conference Date: June 23, 2009 at 10:00 a.m.

Dear Judge Stern:

This firm is special counsel to Allen D. Wilen, Liquidating Trustee for Bayonne Medical Center Liquidating Trust (the "Trustee") in the referenced adversary proceeding. The pre-trial conference in this matter is scheduled for June 23, 2009. The Defendant has failed to plead or otherwise defend within the allowed time and that time has run. The Defendant has not requested nor has it been granted an extension of time to plead or otherwise defend. Based on the Defendant's failure to timely file a pleading or to request an extension of time to plead or otherwise defend this action, the Trustee will soon be submitting default papers in this matter.

Respectfully,

Michael E. Holt

MEH/dp

Allen D. Wilen, Liquidating Trustee cc:

Mohammad Asif

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